

Ex. C

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION  
4  
5

6 IN RE IPHONE APPLICATION LITIGATION. Case No.  
5:11-MD-02250-LHK  
7 -----  
8  
9  
10  
11  
12  
13

14 VIDEOTAPED DEPOSITION OF ISABELLA CAPIRO  
15 PALO ALTO, CALIFORNIA  
16 TUESDAY, OCTOBER 30, 2012  
17  
18  
19  
20  
21  
22  
23

24 REPORTED BY:  
CYNTHIA MANNING, CSR NO. 7645, CLR, CCRR  
25 JOB NO. 54997

1 withdrawn.

2 Did you know how to turn off Wi-Fi prior to  
3 your discussion with the Apple Store representative?

4 A. No.

5 Q. And did you know how to close apps that you  
6 weren't using prior to your discussion with the  
7 Apple Store representative?

8 A. No.

9 Q. And your discussion with the Apple Store  
10 representative was after you obtained the third  
11 iPhone; correct?

12 A. Correct.

13 Q. So this would have been after February  
14 27th, 2011, I believe?

15 A. Correct.

16 Q. So prior to February 27th, 2011, you did  
17 not know how to turn Location Services off; correct?

18 A. Yes.

19 Q. And so it's fair to say that prior to  
20 February 27th, 2011 you did not turn Location  
21 Services off; correct?

22 MR. PARISI: Objection; calls for  
23 speculation.

24 THE WITNESS: Correct.

25 //

## 1                   DECLARATION UNDER PENALTY OF PERJURY

2

3                   I, ISABELLA CAPIRO, do hereby certify under

4 penalty of perjury that I have read the foregoing

5 transcript of my deposition taken on October 30,

6 2012; that I have made such corrections as appear

7 noted herein in ink, initialed by me; that my

8 testimony as contained herein, as corrected, is true

9 and correct.

10

11                   DATED this                   day of

12 2012, at   , California.

13

14

15

16                   ISABELLA CAPIRO

17

18

19

20

21

22

23

24

25

1 STATE OF CALIFORNIA )

2 :SS

3 COUNTY OF SAN MATEO )

4 I, CYNTHIA MANNING, a Certified Shorthand  
5 Reporter of the State of California, do hereby  
6 certify:

7 That the foregoing proceedings were taken  
8 before me at the time and place herein set forth;  
9 that any witnesses in the foregoing proceedings,  
10 prior to testifying, were placed under oath; that a  
11 verbatim record of the proceedings was made by me  
12 using machine shorthand which was thereafter  
13 transcribed under my direction; further, that the  
14 foregoing is an accurate transcription thereof.

15 I further certify that I am neither  
16 financially interested in the action, nor a relative  
17 or employee of any attorney of any of the parties.

18  
19 IN WITNESS WHEREOF, I have subscribed my  
20 name this 9th day of November 2012.

21

22



23

CYNTHIA MANNING, CSR No. 7645, CCRR, CLR

24

25

1 IN THE MATTER OF:

4 Date:

5 Witness:

6 Reason codes:

- 7 1. To clarify the record.  
 8 2. To conform to the facts.  
 9 3. To correct transcription errors.

Page Line Reason

10 From to

11 Page Line Reason

From to

Page Line Reason

13 From to

14 Page Line Reason

From to

Page Line Reason

16 From to

17 Page Line Reason

From to

Page Line Reason

19 From to

20 Page Line Reason

21 From to

22 Page Line Reason

From to

25 ISABELLA CAPIRO